

SCANNED

DATE: 1-31-05

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS
CLERK'S OFFICE

2005 JAN 31 A 8:43

U.S. DISTRICT COURT
DISTRICT OF MASS.

CIVIL ACTION

CASE NO. 04-cv-10468-GAO

ANTHONY BAYAD ,

Plaintiff ,

JOHN CHAMBERS, PATRICIA

RUSSO, ANTHONY

SAVASTANO and CARL

WIESE,

Defendants ,

NOTICE

OF ABUSE TACTICS AND DISOBEDIENCE OF RULE OF LAW

Federal Rule of Civil Procedure: 26, 33, 34, and 36

TO :

Mark Chandlers lead counselor
Robert J. Mathias Chairman
Bruce E. Falby partner
Robin Tarr partner
Lisa Good Heart partner
Firm of Piper Rudnick and Gray Cary
One International Place,
21st Floor Boston, MA 02110

Misconduct of Attorneys as you (Chandlers, Mathias, Falby, Tarr, and GoodHeart,) shall not engage in conduct in connection of practice of law that is prejudicial to the administration of justice, include to knowingly or through callous indifference, disparage, humiliate, or discriminate against litigants as Bayad Pro Se, jurors, witness, court personnel, or other lawyers on any basis, include, but not limited to, on account of race, ethnicity, gender, religion, national origin, disability, martial status, sexual orientation, age, socioeconomic status, employment, or physical characteristics;

You are prohibited to obstruct a civil legal proceeding by altering evidence, evading legal process by destroying evidence in this proceeding. You have destroyed evidence once before and **now** you must refrain your self from destroying the **Cisco Sensitive List so called CISCO-NO-HIRE-LIST**, where Defendants posted or classified or announced Plaintiff Bayad ' name in this list, as follow : **DO NOT HIRE/PROMOTE/TRANSFER ANTHONY BAYAD EMPLOYEE ID#7399, SHOULD YOU HAVE QUESTION CONTACT TONY SAVASTANO (defendant).**

You are commended by law to comply with the Federal Rules of Civil Procedure that [y]ou intentionally ignored in order to evade the answer of Plaintiff Request for admission to defendants Chambers , Wiese, and Savastano, as you are an attorneys and an officers of the Court and a Partner of a firm of revenue of 1 Billion dollars a year, the firm of **Piper Rudnick Gray Cary**; You must obey the Rule of Law and comply by the law of this Court , and to the instruction that plaintiff provided you in his request of admission to Defendants , which stated clearly that within the time provided for in **Rule 36, Fed. R. Civ. P.** and in accordance with said Rule (**Rule 36**), you shall serve upon Plaintiff a written answer or objection addressed to each matter set forth under “ **Request of Admission**” Every matter **not responded** to within the time (**30 days and not 68 days** as you have done), provided for in **Rule 36, Fed. R. Civ. P., is admitted** as **you have failed** to comply with said rule and all your responses were **established** and **admitted** because of your failure to comply with the Rule of Law, as it is very offending to the Rule of Law and to this honorable Court; The fact show Plaintiff proceeding Pro Se have complied with all the request served by you and your Defendants, in accordance with said Rule. You must not forgot that you designed the discovery schedule without Plaintiff cons cent or involvement , and you introduced it surprisingly to Plaintiff and to the court at the Pretrial hearing , and you did not comply with your own discovery schedule and the time set forth in your own schedule discovery docketed before this Court . (it is a clear abuse of power)

You have failed to comply with the **Rule of Civil Procedure Rule 26 and 34**, which describe of disclosing documents or producing documents to other party (as Bayad) , making them available for inspection and copying the documents that you intent to use at the trial or in this litigation or any other evidentiary materials you may have, and not protected by client attorney- privilege, or protected from disclosure; Intentionally you have failed to provide such documents to the plaintiff accordingly to said rules, and again **Plaintiff Bayad proceeding Pro Se** have **complied fully** with said Rule, by producing to you about 400 pages of Exhibits that plaintiff will use at the trial according to the 7th amendment of the constitution.

You have failed to cooperate with **Notice of Deposition** serve to you on December 13, 2004 , to provide the time and place of such meeting, knowingly Plaintiff provided you with a time notice of 60 days, and you failed to respond; Your argument or opinion in response to Depositions of Defendant as you made it very clear to Plaintiff Bayad , that you will not allow it to take place in this litigation because Plaintiff is Pro Se from Morocco, and you are ignoring the fact Plaintiff is an American and a citizen of this land as YOU and your Defendants; Additionally you are trying to send a message to other Defendants who will in future found them selves in Violation of people ' civil Rights set for by Congress in the U.S Constitution, as you made it clear that if you are a Defendant (as Chamber , Savastano, and Wiese) , you are Immune of any liability in any Federal Proceeding simply because you are a Managers or Executives of a Company and with the same Characteristics of a White person as Chambers, Savastano, and Wiese. Your misconduct in this litigation is **very offending to the Law** of This land and to this Honorable Court. There are no Rule of Law nor Memorandum of law in any Law library , nor in Case Law Research as Westlaw , or Lexus that evidence your opinion , and opinion of attorney as yours is not a records in Federal Court or any Federal Proceeding , then you must comply with law .

You must not take advantage of Plaintiff situation (Pro Se), nor of his health, nor of his economical Status, nor of his race, and you must not ignore your legal duty and responsibility, as you should review the professional Ethics set forth by the Bar and the General Rule 11 of pleading in particular, was re-written in an effort to deter dilatory or abuse of tactics as yours and frivolous Motion as you are planning to introduce as a baseless Rule 56, knowingly Plaintiff provided you with **CONCRETE EVIDENCE** as there are uncounted genius issues that must be decided by Jury accordingly to the 7th amendment of our United States Constitution.

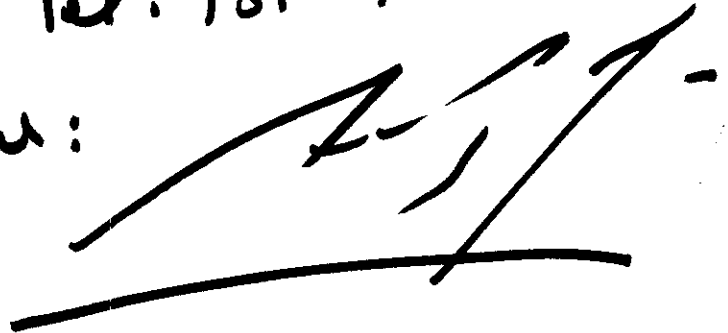
At this time you must stop interfering with Plaintiff Bayad ‘ **right of due process**, based upon the conduct exemplified in this litigation , you (Chandlers, Mattias , falby, Tarr, and Goodheart) have not complied fully with the Rule of Law and you are offending the Rule of Law, by showing in the beginning of discovery issued that arises in this litigation is being incredible disobedience and contentions.

CERTIFICATE OF SERVICE

IT IS HEREBY CERTIFIED that a true and correct copy of Plaintiff
OF ABUSE TACTICS AND DISOBEDIENCE OF RULE OF LAW Federal Rule of Civil
Procedure: 26, 33, 34, and 36 to Defendant Anthony Savastano was furnished via U.S. mail to : Bruce
E.Falby, BBO #544143, PIPER RUDNICK LLP, One International Place, Boston MA 02110,
this 31 day of January 2005

Anthony BAYHD
2 MAGOUN Avenue
Newport, MA 02155
Tel: 781-706-8982

Signature:

A large, stylized handwritten signature in black ink, appearing to be 'Anthony Bayhd', written over a horizontal line.